

Robert D. Mitchell (*admitted pro hac vice*)
William M. Fischbach III (*admitted pro hac vice*)
Ace Van Patten (Nevada Bar No. 11731)



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Counsel for Defendant/Counterclaimant Martin Tripp

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TESLA, INC., a Delaware corporation,

Plaintiff,

vs.

MARTIN TRIPP, an individual,

Defendant.

MARTIN TRIPP, an individual,

Counterclaimant,

TESLA, INC., a Delaware corporation,

Counterdefendant.

Case No. 3:18-cv-00296-LRH-CBC

**MOTION TO WITHDRAW AS
COUNSEL WITH CONSENT**

Pursuant to LR IA 11-6, counsel for Defendant/Counterclaimant Martin Tripp respectfully move for an Order permitting attorneys Robert D. Mitchell, William M. Fischbach, and Ace Van Patten of the law firm of Tiffany & Bosco, P.A. to withdraw as counsel of record.

1 Mr. Tripp is presently residing in Hungary. On August 7, 2020, undersigned counsel
2 received notice via an e-mail sent from Mr. Tripp's e-mail address that he wished to terminate
3 the attorney-client relationship and represent himself. That same day, Mr. Tripp posted a
4 video to YouTube in which he made a similar statement. Undersigned counsel was not able
5 to reach Mr. Tripp by telephone until August 10, 2020, at which time Mr. Tripp confirmed
6 personally that he wished to terminate the attorney-client relationship and represent himself.

7 Discovery in this case is complete, dispositive motions have been briefed, and there is
8 no trial date set. Accordingly, withdrawal of Tiffany & Bosco, P.A. will not result in delay
9 of discovery, the trial, or any hearing in the case. *See* IA LR 11-6(e). Tiffany & Bosco, P.A.
10 has advised Defendant/Counterclaimant Martin Tripp of the status of pending litigation and
11 all applicable deadlines. All future correspondence to Defendant/Counterclaimant Martin
12 Tripp should be mailed to:

13 Mr. Martin Tripp
14 Bocskai Utca 11/A
15 Cece 7013
16 Hungary
(775) 600-7238
mtprotons@protonmail.com

17 Typically, counsel are ethically obligated to provide the client a copy of the client's
18 file before withdrawing. However, given that this case involves materials designated as
19 Attorney's Eyes Only (AEO) under a protective order [ECF No. 44], undersigned counsel
20 request that the Court's order granting withdrawal direct Tiffany & Bosco, P.A. to withhold
21 all AEO material from Mr. Tripp absent a further order of this Court.

22 WHEREFORE, Robert D. Mitchell, William M. Fischbach, and Ace Van Patten of the
23 law firm of Tiffany & Bosco, P.A., respectfully request that the Court enter its order
24 authorizing withdrawal as counsel of record for Defendant/Counterclaimant Martin Tripp.
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1 DATED this 11th day of August, 2020.

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3 TIFFANY & BOSCO, P.A.

4
5 By /s/William M. Fischbach

6 Robert D. Mitchell

7 William M. Fischbach III

8 Ace Van Patten

9 Camelback Esplanade II, Seventh Floor

10 2525 East Camelback Road

11 Phoenix, Arizona 85016

12 *Counsel for Defendant/Counterclaimant*

PROOF OF SERVICE

I am employed in the County of Maricopa, State of Arizona. I am over the age of 18 and not a party to the within action; my business address is Tiffany & Bosco, P.A. 2525 E. Camelback Road, Suite 700, Phoenix, Arizona 85016.

On August 11, 2020, I served the following described as:

MOTION TO WITHDRAW AS COUNSEL WITH CONSENT

on the following interested parties in this action:

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☒ (BY EMAIL) By transmitting the above documents to the above email addresses.

☒ (STATE) I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED on this 11th day of August, 2020 at Phoenix, Arizona.

/s/William Fischbach